

No. 24-1656

---

---

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

LAQUITA OLIVER, ET AL,

*Plaintiffs-Appellants,*

v.

NAVY FEDERAL CREDIT UNION.,

*Defendant-Appellee.*

---

On Appeal from the United States District Court  
for the Eastern District of Virginia  
Case No. 23-cv-1731 (Hon. Leonie M. Brinkema, U.S. District Judge)

---

**MOTION TO WITHDRAW SHANA H. KHADER AS COUNSEL  
FOR PLAINTIFFS-APPELLANTS**

---

Shana Khader  
TYCKO & ZAVAREEI LLP  
2000 Pennsylvania Ave. NW, Ste. 1010  
Washington, DC 20006  
202-973-0900  
skhader@tzlegal.com

*Counsel for Plaintiffs-Appellants*

---

---

Pursuant to Local Rule 46(c), Shana H. Khader, counsel for Plaintiffs-Appellants Bob Otondi, Dennis Walker, Charles Gardner, Marie Pereda, Laquita Oliver, John Jackson, Carl Carr, Constantina Batchelor, and Christina Hill, respectfully moves to withdraw as counsel. As of December 17, 2025, Ms. Khader will no longer be employed with Tycko & Zavareei LLP. Plaintiffs' counsel has provided Plaintiffs-Appellants notice of Ms. Khader's withdrawal.

Tycko & Zavareei LLP will continue to represent Plaintiffs through Hassan A. Zavareei, Andrea R. Gold, Glenn E. Chappell, and F. Peter Silva II, who have entered appearances in this case. The rest of Plaintiffs' representation will also remain in the case, such that Plaintiffs' representation will be unaffected.

For these reasons, the undersigned counsel respectfully requests that the Court grant leave to withdraw as counsel for Plaintiffs-Appellants.

Dated: December 16, 2025

Respectfully submitted,

/s/ Shana H. Khader

Shana H. Khader

TYCKO & ZAVAREEI LLP

2000 Pennsylvania Ave. NW, Ste. 1010

Washington, DC 20006

202-973-0900

skhader@tzlegal.com

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 15, 2025, counsel for Plaintiffs conferred with counsel for Defendant-Appellee, who stated that Defendant-Appellee does not oppose the relief sought herein.

/s/ Shana H. Khader

Shana H. Khader

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

/s/ Shana H. Khader  
Shana H. Khader